



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 17, 2000

Leonard S. Miller, Treasurer
American Council of Life Insurance,
Life Insurance PAC
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Identification Number: C00147066

Reference: December Monthly Report (11/1/99-11/30/99)

Dear Mr. Miller:

This letter is to inform you that as of February 16, 2000, the Commission has not received your response to our request for additional information, dated January 27, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission acknowledges that you have provided occupation and name of employer information in your 1999 Amended December Monthly Report dated January 14, 2000; however, you still need to address the excessive contribution referenced in our letter. If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Dominick Ciaraldi on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Leonard S. Miller, Treasurer
American Council of Life Insurance,
Life Insurance PAC
1001 Pennsylvania Avenue NW
Washington, DC 20004

JAN 27 2003

Identification Number: C00147066

Reference: December Monthly Report (11/1/99-11/30/99)

Dear Mr. Miller:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

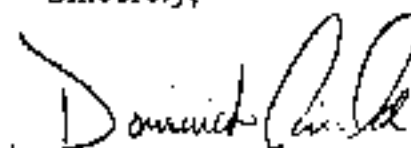
Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly

scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dominick Ciaraldi". The signature is fluid and cursive, with the first name being more prominent.

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 11(c)

Contributions From Other Political Committees (such as PACs)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
American Council of Life Insurance PAC

Full Name, Mailing Address and ZIP Code

ReliaStar Federal PAC

P. O. Box 20

Minneapolis, MN 55440-0020

Name of Employer

ReliaStar Federal PAC

Date (month,
day, year)

11/04/1999

Amount of Each
Receipt this Period

\$5,000.00

Occupation

Receipt For:

☐ Primary ☐ General☐ Other (specify):

Aggregate Year-to-Date \$ 5,000.00

Full Name, Mailing Address and ZIP Code

PrinPAC

711 High Street

Des Moines, IA 50392

Name of Employer

PrinPAC

Date (month,
day, year)

11/04/1999

Amount of Each
Receipt this Period

\$2,500.00

Occupation

c/o Principal Financial Group

11/11/1999

\$2,500.00

Receipt For:

☐ Primary ☐ General☐ Other (specify):

Aggregate Year-to-Date \$ 7,500.00

SUBTOTAL of Receipts This Page (optional)

\$ 10,000.00

TOTAL This Period (last page this line number only)

\$ 10,000.00

SCHEDULE A

ITEMIZED RECEIPTS

 List separate schedule(s)
for each category of the
Detailed Summary Page

 PAGE 1 OF 2
FOR LINE NUMBER 11(c)

Contributions From Other Political Committees (such as PACs)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF COMMITTEE (in Full)
American Council of Life Insurance PAC

Full Name, Mailing Address and ZIP Code

 New York Life PAC
51 Madison Avenue
New York, NY 10010

Name of Employer

New York Life PAC

Date (month,
day, year)

3/30/1999

Amount of Each
Receipt this Period

\$5,000.00

Occupation

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 5,000.00

Full Name, Mailing Address and ZIP Code

 Penn Mutual PAC
Independence Square R2C
Philadelphia, PA 19172-0001

Name of Employer

Penn Mutual Life Insurance Company

Date (month,
day, year)

3/23/1999

Amount of Each
Receipt this Period

\$5,000.00

Occupation

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 5,000.00

Full Name, Mailing Address and ZIP Code

 ULICO PAC
111 Massachusetts Avenue, NW
Washington, DC 20001

Name of Employer

Union Labor Life Insurance Company

Date (month,
day, year)

3/30/1999

Amount of Each
Receipt this Period

\$3,000.00

Occupation

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 3,000.00

Full Name, Mailing Address and ZIP Code

 Principal Financial Group PrinPAC
711 High Street
Des Moines, IA 50392

Name of Employer

Principal Financial Group PrinPAC

Date (month,
day, year)

3/15/1999

Amount of Each
Receipt this Period

\$2,500.00

Occupation

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 2,500.00

SUBTOTAL of Receipts This Page (optional)

\$ 15,500.00

TOTAL This Period (see page this line number only)

\$ 40,500.00

